

Exhibit 1

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
Plaintiff,)
vs.) Case No.
UBER TECHNOLOGIES, INC.,) 3:17-cv-00939-WHA
OTTOMOTTO LLC; OTTO)
TRUCKING LLC,)
Defendants.)

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VIDEOTAPED DEPOSITION OF DANIEL CHU
San Francisco, California
Monday, April 3, 2017
Volume I

Reported by:

SUZANNE F. GUDELJ, CSR No. 5111

Job No. 2583707

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Defendants.)

Videotaped deposition of DANIEL CHU,
Volume I, taken on behalf of Defendants Uber
Technologies, Inc., Ottomotto LLC and Otto
Trucking LLC, at the Law Offices of Morrison &
Foerster LLP, 425 Market Street, 33rd Floor,
San Francisco, California, beginning at 10:04
a.m. and ending at 11:07 a.m., on Monday, April
3, 2017, before SUZANNE F. GUDELJ, Certified
Shorthand Reporter No. 5111.

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1 greatest share of the ride-share market?

2 A It -- it just shows Uber has the largest
3 share.

4 Q And what share does it show that Uber has?

5 A Once again, I don't remember the exact 10:09:36
6 numbers, but somewhere in the like 80 percent range.
7 Somewhere around there.

8 Q Would you agree that if you could slow Uber
9 down through litigation, that would be of a
10 competitive benefit to Waymo? 10:09:53

11 MS. BAILY: Object to form.

12 THE WITNESS: It's -- well, are you talking
13 about litigation in general or like this -- this
14 litigation in specific?

15 BY MR. GONZALEZ: 10:10:08

16 Q Litigation in general.

17 A The reason I ask is I think it's not clear
18 to me kind of -- not every litigation is going to
19 impact their ride-sharing growth, I think.

20 Q All right. Fair enough. Let's talk about 10:10:20
21 this litigation.

22 A Yeah.

23 Q Would you agree that this litigation, if
24 the judge were to issue an injunction of any kind
25 against Uber, that that would be competitively 10:10:27

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1 beneficial to Waymo?

2 MS. BAILY: Object to form.

3 THE WITNESS: So I think it is beneficial
4 in the -- in the fact that our technology for Waymo
5 is critical to our entry into ride-sharing. So -- 10:10:40
6 so -- so that -- from that perspective, it is
7 important that we maintain that lead.

8 BY MR. GONZALEZ:

9 Q Do you ever have communications with public
10 agencies about your vehicles? 10:10:51

11 A Do --

12 MS. BAILY: Object to form.

13 THE WITNESS: Do I personally or --

14 BY MR. GONZALEZ:

15 Q Yes, you. 10:10:57

16 A Most of my efforts are more internal
17 focused.

18 Q Who at Waymo is the person who communicates
19 with public agencies to try to get approval for you
20 to be able to drive your autonomous vehicles there? 10:11:08

21 A It's probably going to be more of our
22 public policy team and our partnership teams.

23 Q And who are the people who are in charge of
24 those groups?

25 A So -- I'm trying to think. So Kevin Vosen, 10:11:20